

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

GREAT BOWERY INC d/b/a  
TRUNK ARCHIVE,

Plaintiff,

v.

CONSEQUENCE SOUND LLC,  
CONSEQUENCE MEDIA  
GROUP INC.; and DOES 1  
through 10 inclusive

Defendant.

Case No. **9:23-cv-80488**

**DECLARATION OF JENNIFER  
ROCKWOOD**

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I, Jennifer Rockwood, declare as follows:

1. I am a Senior Copyright Permissions Manager for Great Bowery Inc d/b/a Trunk Archive (“Trunk Archive”). I am over the age of 18 years old. I have personal knowledge of all matters stated herein, and if called as a witness, I could and would competently testify thereto.

2. As part of my duties as Senior Copyright Permissions Manager with Trunk Archive, I assist with the enforcement of copyrights in photographs that are exclusively licensed by Trunk Archive.

3. Annie Leibovitz is the copyright holder to the Episode VII Photographs, the Episode VII Photographs, and the Episode IX Photographs at issue in this action.

4. Ms. Leibovitz has granted Trunk Archive the exclusive right to license her images.

5. Ms. Leibovitz has also authorized Trunk Archive to enforce her copyrights in any infringement related actions on her behalf.

6. On June 8, 2022, I discovered the Episode VII Photographs being used by Defendants on Defendants' website [www.consequence.net](http://www.consequence.net) in an article titled "Details for Star Wars: The Force Awakens surface in Vanity Fair shoot – watch", written by Michael Roffman ("Force Awakens Article").

7. True and correct screenshots of the Episode VII Photographs as used in the Force Awakens Article are submitted herewith as Exhibit 33.

8. On June 8, 2022, I discovered the Episode VIII Photographs being used by Defendants on Defendants' website [www.consequence.net](http://www.consequence.net) in an article titled "Star Wars: The Last Jedi details and photos surface in Vanity Fair cover story", written by Michael Roffman ("Last Jedi Article").

9. True and correct screenshots of the Episode VIII Photographs as used in the Last Jedi Article is submitted herewith as Exhibit 34.

10. On June 8, 2022, I discovered the Episode IX Photographs being used by Defendants on Defendant's website [www.consequence.net](http://www.consequence.net) in an article titled "Star Wars: The Rise of Skywalker Vanity Fair", written by Michael Roffman ("Rise of Skywalker Article")

11. True and correct screenshot of the Episode IX Photographs as used in the Rise of Skywalker Article are attached hereto as Exhibit 35.

12. After I discovered the Episode VII Photographs, the Episode VIII Photographs, and the Episode IX Photographs (collectively the "Star Wars Photographs") on Defendants' Website, I checked Trunk Archive's licensing records and confirmed that Trunk Archive did not grant a license to

Consequence Sound LLC, Consequence Media Group Inc., Michael Roffman, or any other person or entity associated with Defendants.


13. Once I confirmed that Defendants did not have a license for use of the Star Wars Photographs, I forwarded information regarding this claim to Trunk Archive's copyright attorneys at Higbee & Associates.

14. Higbee & Associates reached out to Defendants to try to resolve the matter directly with them, but they were unsuccessful.

15. Following Higbee & Associates attempts to resolve this matter, a representative from Trunk Archive reached out to copyright holder Annie Leibovitz's team to get litigation approval to move forward with filing a federal copyright infringement case as to Defendants' use of the Star Wars Photographs.

I declare under penalty of perjury that the foregoing is true and correct under the laws of the United States of America.

Executed this May 9, 2024 at Barrington, Illinois

  
Jennifer Rockwood